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2
3 IN THE MATTER OF)
4 COUNTY ROAD 10 LANDFILL) VOLUME III
5 (HIMCO DUMP))
6
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8

9 The continued sworn statement of JERRY D.
10 PERRIN, called as a witness by Miles Inc., taken
11 before Rosemary J. Bell, CSR, RPR, a Notary
12 Public in and for the County of St. Joseph and
13 State of Indiana, at Barnes & Thornburg, 305
14 Ameritrust National Bank Building, 301 South
15 Main Street, Elkhart, Indiana, on Thursday,
16 October 15, 1992, commencing at the hour of
17 10:41 a.m.
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1 APPEARANCES:

2 MR. RHETT R. DENNERLINE
3 Kirkland & Ellis
4 200 East Randolph Drive
5 Chicago, Illinois 60601

6 Appeared on behalf of Miles Inc.;

7 MR. RICHARD W. PAULEN
8 Barnes & Thornburg
9 305 Ameritrust National Bank Building
10 301 South Main Street
11 Elkhart, Indiana 46516

12 Appeared on behalf of HIMCO WASTE-AWAY
13 SYSTEMS, INC.
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E X H I B I T

No. 2 List of Additional HIMCO
Customers Page 331

1 JERRY D. PERRIN,
2 called as a witness, having been previously duly
3 sworn, was examined and testified further as
4 follows:

5 EXAMINATION (Continued)

6 BY MR. DENNERLINE:

7 Q. Mr. Perrin, my name is Rhett Dennerline, and I'm
8 with the Kirkland & Ellis law firm. We
9 represent Miles in relation to the County Road
10 10 landfill, the Superfund site.

11 Today we are going to continue taking
12 your statement to provide a record of what you
13 recall, what you remember, about the various
14 customers of HIMCO WASTE-AWAY SERVICES and
15 otherwise the County Road 10 landfill. I'll be
16 asking you a series of questions just like Mr.
17 Oslan did, and we'll be requesting you to answer
18 those questions.

19 If at any time you need to take a
20 break, just let me know. If you want me to
21 rephrase a question, let me know that.

22 Mr. Perrin, Mr. Oslan covered several
23 areas last time he spoke to you, but I want to
24 go back and rediscuss some of those.

25 First of all, and sort of to make the

1 record clear for this statement, continuation of
2 this statement, you are employed with whom?

3 A. HIMCO WASTE-AWAY SERVICES, INC.

4 Q. Okay. And when did you start working for them?

5 A. Nineteen seventy.

6 Q. Do you remember which month?

7 A. Not really, no, sir.

8 Q. Early part of the year or later?

9 A. I would say the early part of the year.

10 Q. Okay. As I recall, in the previous statement
11 you said 1968?

12 A. That's --

13 Q. I take it your recollection now is --

14 A. That's correct.

15 Q. Okay. And why has it changed?

16 A. Because of some records that I've looked up.

17 Q. Okay. And those would have been, if you recall?

18 A. My W-2 tax forms.

19 Q. Okay. Let's go back. In your last statement we
20 had talked about or Mr. Oslan and you had talked
21 about several companies that were customers of
22 HIMCO INC.

23 Can we with us the term HIMCO INC. to
24 refer to HIMCO WASTE AWAY?

25 A. (Witness nods head.)

1 Q. In regards to those companies, you had
2 identified certain wastes that the companies had
3 deposited at the landfill, and again we're
4 talking about the County Road 10 landfill in
5 Elkhart.

6 A. Yes.

7 Q. You said that you drove a truck for HIMCO. How
8 often would you drive a truck route for HIMCO?

9 A. Basically on the weekends. About every -- about
10 every third week, I think. There were three
11 drivers. They wanted me to share in the weekend
12 duties. So I would -- on about every third
13 weekend I would run the routes.

14 Q. And during the week would you run the route any
15 time?

16 A. To the best of my recollection, I would say once
17 in a while if I had a break and there was an
18 extra load that needed to be picked up, yes, I
19 might run out and grab a load and dump it.

20 Q. When you ran the routes, were those regular
21 routes?

22 A. Well, how do you define "regular"?

23 Q. Were some of those routes what you would call
24 regular routes, meaning that you knew you had to
25 go to company X first and then company Y and

1 company Z and so forth?

2 A. I would say yes. In the case of Miles, which we
3 hauled an awful lot of trash from Miles, we knew
4 we had to go there on a daily basis. If you
5 were doing a house-to-house route, that would be
6 a regular route. Then once you left Miles, it
7 was more on a call-in basis. You might run from
8 the north side of town to the east side of town
9 or whatever. But not per se that you just
10 followed a route. It was when the customer
11 wanted his trash dumped.

12 Q. Going back to Exhibit No. 1, let me just take a
13 name off the front page. Alum-A-Form Company,
14 they would just call up over the weekend while
15 you were there and you would come and pick up
16 their trash?

17 A. Right.

18 Q. Now, when you did these routes with the truck on
19 the weekend or sometimes during the week and you
20 operated the truck, did you physically get out
21 of the truck and hook up containers to the truck
22 and so forth?

23 A. Yes, sir.

24 Q. Did you have occasion to look inside of those
25 containers?

1 A. Yes, sir.

2 Q. Did you ever see waste or trash fall out of
3 those containers and pick it up?

4 A. Yes, sir.

5 Q. Do you recall a time where you may have had to
6 throw a tarpaulin over the top of the trash --

7 A. Yes, sir.

8 Q. -- or some sort of cover and you would be able
9 to look in and see what was inside those
10 containers?

11 A. Yes, sir.

12 Q. Now in addition to running the routes and seeing
13 the trash that you picked up, would you ever
14 speak to any of the employees at the companies
15 where you picked up trash?

16 A. I would say on a rare occasion, yes, sir.

17 Q. And when you spoke to them, would you talk about
18 their operations and what they may make there
19 and so forth, what they were manufacturing, for
20 example?

21 A. No, I wouldn't say that. There might be an
22 occasion where we would have to look somebody up
23 to sign a ticket that we picked up the load and
24 then we would have a copy that we would leave
25 with that person.

1 Q. But when you went to the company, you could see
2 what their operations were? For example, if you
3 went to a mobile home manufacturer, you knew
4 that they manufactured mobile homes and so
5 forth; is that --

6 A. Oh, yes. You could see a lot of action going
7 on, yes.

8 Q. When you brought the trucks back to the County
9 Road 10 landfill when you were the driver on
10 that particular weekend, would you be the one
11 dumping the garbage on the landfill dirt?

12 A. Yes, sir.

13 Q. When you did that, could you see the trash and
14 so forth being dumped out of the truck?

15 A. Yes, sir.

16 Q. And after you had dumped the trash, were you the
17 one that would -- I know you talked about
18 operating a dozer. Were you the one that would
19 get on the dozer and then move the trash?

20 A. Yes, sir.

21 Q. Let's talk about your dozer operation. In fact,
22 as you said before, wasn't that your primary job
23 at the landfill?

24 A. Yes, sir.

25 Q. And let's start back in 1970. What type of

1 dozer did you operate then?

2 A. It was a little 760 Case.

3 Q. Okay. I take it that that dozer was used to
4 move all the trash that was dumped at the
5 landfill; is that correct?

6 A. Yes, sir.

7 Q. Could you describe what you would do when a
8 truck came in to the landfill and had dumped a
9 load onto the landfill ground.

10 A. Yes, sir. We would -- well, basically I would
11 have a designated area that the truckdrivers
12 would pull into and back up to unload their
13 trash. Then after they dumped their trash or I
14 had dumped the load and the truck had pulled out
15 of the way, then I would take the bulldozer and
16 go in there. And basically I didn't push a
17 whole truckload at once. I would more or less
18 tear that load of trash apart and break it loose
19 to compact the trash, to flatten it out so when
20 the next truck came in, he would be able to back
21 over the top of that. And after I'd built up an
22 area of trash, say 15, 20 feet, and it was nice
23 and flat, I usually had a pile of dirt there,
24 and I would put a little dirt over the top of
25 it. So the next time the truck backed in, it

1 would back a little farther so I wouldn't have
2 to push that trash so far. I would -- I would
3 put it in its burial ground as quickly as
4 possible, I guess is the way I would explain it.

5 Q. When you were operating the dozer and, as you
6 described, breaking apart the trash, I take it
7 the dozer had an open cab and you could see the
8 trash that you were breaking?

9 A. Yes, sir.

10 Q. When a truckload would come in, were there
11 certain truckloads that had just come from one
12 customer? What I mean by that is that truckload
13 had just come from, for example, Alum-A-Form
14 Company, as the example that I used before?

15 A. Yes, sir.

16 Q. And you knew that everything in that truckload
17 came from Alum-A-Form; is that correct?

18 A. Yes, sir. Unless it would have been a front-end
19 loader. Now, when you had a front-end loader
20 come in, it could have been in the 2- and 3- and
21 4-yard containers. There would have been
22 several containers from several different
23 places.

24 Q. But you would know where those loads came from
25 if you, for example, spoke to the driver or you

1 were familiar with the route; is that right?

2 A. Right, right.

3 Q. Did you speak with the drivers when they'd come
4 in?

5 A. Yes, frequently.

6 Q. Would they say where they had just come from?

7 A. Yes.

8 Q. When you were on the dozer and breaking apart
9 the trash, you could see the trash you were
10 breaking apart and what it was composed of, for
11 example?

12 A. Yes, sir.

13 Q. When you moved the trash, would you physically
14 drive over it with the dozer?

15 A. Yes, sir.

16 Q. I take it you could just look down and see what
17 you were driving over?

18 A. Yes, sir.

19 Q. Did you ever have occasion to get off your dozer
20 and, I don't know, for example, pull something
21 out of the tracks or, I don't know what, have to
22 actually pick up the trash yourself?

23 A. Frequently. Yes, sir.

24 Q. And when you did that, do you ever recall seeing
25 any types of names stamped on pieces of the

1 trash you saw or logos or something?

2 A. Yes, sir.

3 Q. Now, later on in the operations of the landfill,
4 did you still continue to use a dozer?

5 A. Yes, sir.

6 Q. And did it have an open cab as well, the next
7 dozer you used?

8 A. Yes, sir, I believe it did.

9 Q. What I mean by open cab, you could see out
10 obviously to operate the machine and you could
11 also see the trash that you were compacting, for
12 example?

13 A. Yes.

14 Q. Going back to when you drove your routes and you
15 went to pick up containers, did you become
16 familiar with the type of container a particular
17 company would use?

18 A. Yes, sir.

19 Q. So would it be correct to say that when a
20 certain container came in to the landfill to
21 dump its load, you would be able to recognize
22 where that container came from?

23 A. Yes, sir.

24 Q. Did you run the truck routes -- let me ask it
25 this way: Over how many years did you run the

1 truck routes at HIMCO?

2 A. From '70 to '72.

3 Q. And from what period of time did you operate the
4 dozer at HIMCO?

5 A. From '70 to the present day.

6 Q. So you're still operating a dozer at -- I take
7 it you work for Earthmovers now?

8 A. Yes, sir.

9 Q. And you worked on a dozer -- rather, operated a
10 dozer for the entire time that you worked at the
11 County Road 10 landfill; is that correct?

12 A. Yes, sir.

13 Q. Were you at the landfill Monday through Friday
14 at the time you worked there?

15 A. More like Monday through Saturday and maybe a
16 couple or three hours on Sunday if need be the
17 case.

18 Q. How many hours a day would you work during the
19 week?

20 A. I averaged probably 50 hours.

21 Q. You mean a week?

22 A. Uh-huh.

23 Q. Do you know how many hours a day that was?
24 Probably 10 hours a day during the week?

25 I'm sorry, I don't mean to confuse

1 you. Do you mean 50 hours for Monday through
2 Saturday and then a few hours on Sunday?

3 A. Right.

4 Q. So --

5 A. I'll put it this way: I made my money by
6 working overtime. And I did whatever it took to
7 get the job done.

8 Q. And during the time that you worked at the
9 County Road 10 landfill, you spent most of your
10 time outside; is that correct?

11 A. That's correct.

12 Q. And when I say outside, I mean working in the
13 landfill area.

14 A. That's correct.

15 Q. And that would be the area where all the trash
16 and refuse was brought in from the trucks; is
17 that correct?

18 A. That's correct.

19 Q. And it would also be the area where you were
20 operating the dozer and you would be running
21 over the trash and you could see what was on the
22 ground; right?

23 A. That's correct.

24 MR. DENNERLINE: Let's take a break.

25 Back on the record.

1 BY MR. DENNERLINE:

2 Q. Mr. Perrin, it would be correct to say then that
3 based on your experience of working in the
4 landfill and operating the dozer and you being a
5 driver driving the routes for HIMCO, that would
6 form the basis of you being able to identify
7 what wastes were dumped in the landfill and by
8 whom; is that correct?

9 A. Yes, sir.

10 MR. DENNERLINE: Okay. Let's move on
11 to what we have here, and we'll have this marked
12 as Exhibit No. 2, which is an additional list of
13 HIMCO customers or what we think might be HIMCO
14 customers, and we're going to, just like the
15 previous listing, go through these and see what
16 you know about them and get that put down.

17 (Exhibit No. 2 marked for
18 identification.)

19 BY MR. DENNERLINE:

20 Q. All right. Mr. Perrin, I'm going to put in
21 front of you Exhibit No. 2. And let's just
22 start at the top with Abshire. Now, it says
23 Abshire 1330 Benham. I take it we'll agree that
24 1330 Benham is an address; is that correct?

25 A. Yes, sir.

1 Q. Are you familiar with Abshire?

2 A. Yes, sir.

3 Q. What type of business was Abshire in during the
4 period that you worked at the landfill?

5 A. It was a car wash.

6 Q. Did Abshire dispose of their waste at the County
7 Road 10 landfill?

8 A. Yes, sir.

9 Q. Do you believe that HIMCO was the only company
10 that picked up their waste?

11 A. Yes, sir.

12 Q. Are you familiar with the type of waste Abshire
13 might have disposed of?

14 A. Not really. I would assume that it was just the
15 office paper from running the car wash and
16 whatever they would have. It runs in my mind
17 it's a front-end loader.

18 Q. Would they have disposed of any soaps or
19 cleaners or anything like that?

20 A. I would say it was a possibility.

21 Q. Okay. So you believe they probably disposed of
22 those, a possibility they disposed of those?

23 A. Yes, sir.

24 Q. How frequently do you think HIMCO picked up
25 their container?

- 1 A. Twice a week.
- 2 Q. And when you say a front-end container, is that
3 a 4-yard container?
- 4 A. It could be a 2, 3, or 4.
- 5 Q. All right. Accent Industries, are you familiar
6 with Accent?
- 7 A. The name sounds familiar, but no.
- 8 Q. Action Lighting, are you familiar with Action
9 Lighting?
- 10 A. Yes. I think they are -- they sell lights,
11 electrical lights.
- 12 Q. Were they in that type of business at the time
13 that you worked at the landfill?
- 14 A. I believe, yes.
- 15 Q. Are you familiar with the type of waste they may
16 have disposed of at the landfill?
- 17 A. The only thing I remember from Action Lighting
18 is they threw away a lot of cardboard boxes, a
19 few skids, and maybe their office supplies,
20 paper.
- 21 Q. Did they throw away any glues or adhesives?
- 22 A. Not to my knowledge.
- 23 Q. What about soldering agents?
- 24 A. Not to my knowledge.
- 25 Q. Any bulbs?

1 A. I don't recall.

2 Q. Was HIMCO the only company to your knowledge
3 that picked up their waste?

4 A. To my knowledge, yes, sir.

5 Q. Do you recall what size container they had?

6 A. No, sir.

7 Q. Let's move on to Actionflex. Are you familiar
8 with Actionflex?

9 A. No, sir.

10 Q. All right. Alcan Aluminum, are you familiar
11 with them?

12 A. That name sounds familiar, but no.

13 Q. Do you recall where they might have been
14 located?

15 Or I guess a better question is do you
16 know if they're in Elkhart today? Does that
17 ring a bell?

18 A. No, it doesn't.

19 Q. All right. Alpine Wood Products, do you recall
20 them?

21 A. No, sir.

22 Q. American Fiberglass, are you familiar with them?

23 A. There again, that name sounds familiar, and I
24 believe they were a small company but --

25 Q. Do you recall if they had their operations on

1 Winding Waters Lane?

2 A. Who are you referring to now?

3 Q. I'm sorry, American Fiberglass.

4 A. American Fiberglass?

5 Q. Yes.

6 A. I don't, no, sir.

7 Q. American Gyro-Tex, are you familiar with them?

8 A. No, sir.

9 Q. American Sterling, are you familiar with them?

10 A. No, sir.

11 Q. Amerigo, are you familiar with them?

12 A. The name sounds familiar, and I believe they

13 might have made camper trailers, but I don't

14 recall their trash.

15 Q. Do you know if they're in Elkhart today as a

16 business?

17 A. No, sir, I do not.

18 Q. ARA Service, are you familiar with that company?

19 A. Yes, sir.

20 Q. What type of business is ARA Service involved

21 in?

22 A. Rental uniforms.

23 Q. Did ARA dispose of their waste at the landfill

24 at the time you were working there?

25 A. Yes, sir.

1 Q. Do you recall what type of wastes they disposed
2 of at the landfill?

3 A. To the best of my recollection, it was just --
4 they warehoused their uniforms there. In other
5 words, the uniform trucks would go out on their
6 routes, pick up the dirty uniforms, take them to
7 this station, and then another semi would come
8 in and they would take the uniforms to South
9 Bend and they would dry clean them and turn
10 around and bring them back.

11 And the only thing I can recall about
12 them is we just picked up their office supply --
13 whatever it took to run the office at the place.

14 Q. Did they have dry cleaning operations at the
15 place you picked up their trash?

16 A. Not that I recall, no, sir.

17 Q. The next one is Atlas Axle. Are you familiar
18 with Atlas Axle?

19 A. There again, the name sounds familiar, but I
20 can't bring it to place.

21 Q. Do you know if they were a foundry or not?

22 A. I don't believe so. I don't believe they were a
23 foundry. I think they just put the axles on and
24 maybe mounted the wheels for the trailer
25 industry.

- 1 Q. All right. The next one is Batteries
2 Unlimited. Are you familiar with that company?
- 3 A. No.
- 4 Q. Would it help your memory to know that they were
5 on 2100 West Franklin Street?
- 6 A. That jogs a -- that jogs my memory.
- 7 Q. Take your time if you want to think.
- 8 A. Well, if they were on Franklin Street, I don't
9 believe they were in business in the County Road
10 10 era. And I know they're no longer in
11 business.
- 12 Q. Okay. Let's move on to BTK Extra. Are you
13 familiar with that company?
- 14 A. No, sir.
- 15 Q. Are you familiar with the next one here, Burton
16 Enterprises?
- 17 A. No, sir.
- 18 Q. Are you familiar with Caustic Ready?
- 19 A. No, sir.
- 20 Q. The next one is Chemcraft. Are you familiar
21 with them?
- 22 A. That name rings a bell.
- 23 Q. Would it help your memory if you knew they were
24 on Adams Street?
- 25 A. No, sir. I think they're related to the trailer

1 industry, but I -- I can't recall.

2 Q. Do you recall if Chemcraft manufactured bathroom
3 vanities?

4 A. That jogs my memory a little bit, but I just
5 can't place them.

6 Q. All right. Let's move on to Coleman Company.
7 Do you recall or are you familiar with Coleman
8 Company?

9 A. To the best of my recollection, they were a
10 distributor of small furnaces for the RV
11 industry.

12 Q. Did Coleman Company dispose of their waste at
13 the County Road 10 landfill?

14 A. Yes, sir, I believe they did.

15 Q. Are you familiar with the types of waste they
16 disposed of there?

17 A. I can recall seeing cardboard boxes that had the
18 Coleman Company name on them and skids, banding,
19 but other than that, no, sir.

20 Q. Do you recall them disposing of any scrap
21 furnaces or furnace parts?

22 A. No, sir.

23 Q. Any type of soldering material or --

24 A. No.

25 Q. -- fastening material?

- 1 A. No, sir.
- 2 Q. All right. Let's move on to Compressed Air.
- 3 And on Exhibit 2 that should be a capital C, I
- 4 take it. Are you familiar with Compressed Air?
- 5 A. No, sir.
- 6 Q. The next one is Concord Motor Home. Are you
- 7 familiar with them?
- 8 A. Yes, sir.
- 9 Q. What type of business was Concord Motor Home
- 10 involved in at the time you worked at the
- 11 landfill?
- 12 A. I believe they made a motor home.
- 13 Q. Okay. Did Concord Motor Home dispose of their
- 14 waste at the County Road 10 landfill?
- 15 A. I'm going to say it's a possibility. They might
- 16 have come into play after County Road 10 to the
- 17 best of my recollection.
- 18 Q. Are you familiar with what type of wastes they
- 19 may have disposed of at the landfill?
- 20 A. No, sir.
- 21 Q. Do you recall what size container they may have
- 22 used?
- 23 A. No, sir.
- 24 Q. All right. Conoplastics is the next one. Are
- 25 you familiar with that company?

1 A. No, sir.

2 Q. The next company is Consoweld. Are you familiar
3 with Consoweld?

4 A. That name is very familiar. I have to say yes.

5 Q. Would they have been involved in manufacturing
6 plastics?

7 A. I thought Consoweld manufactured countertops.

8 Q. Would those be formica countertops?

9 A. I would say yes.

10 Q. All right. Would you be familiar with -- strike
11 that.

12 Did Consoweld dispose of their waste
13 at the County Road 10 landfill at the time you
14 worked there?

15 A. If my recollection is correct, I would say yes.

16 Q. And were you familiar with the type of waste
17 that Consoweld would generate from manufacturing
18 countertops?

19 A. Well, yes. If I'm correct, it would have been
20 mostly pieces of chipboard and chipboard with
21 the countertop or the plastic adhered to it and
22 then the cut-out for like a sink or whatever.

23 Q. And they disposed of those at the landfill?

24 A. Yes, sir.

25 Q. Do you recall if they disposed of any type of

1 adhesives or glues that they may have used in
2 the manufacturing process?

3 A. I would say yes. Empty buckets of.

4 Q. Of adhesives and glues?

5 A. Correct.

6 Q. What size container did Consoweld have?

7 A. If I'm right, I think they had a 16-yard.

8 Q. Do you recall how often that container was
9 picked up by HIMCO?

10 A. I would say probably once a week.

11 Q. And is it your understanding that HIMCO is the
12 only company that picked up their waste?

13 A. Yes, sir.

14 Q. And do you recall any other wastes that
15 Consoweld may have disposed of at the landfill?

16 A. No. Maybe a little cardboard or what have you
17 between the countertop material.

18 Q. Any paint cans or stain cans?

19 A. Not that I recall, no.

20 Q. All right. D & M Glass, are you familiar with
21 D & M Glass Company?

22 A. No, sir.

23 Q. The next one is Eagle Enterprises. Are you
24 familiar with that company?

25 A. The name sounds familiar, and to my belief they

1 were a manufacturer of, I'd say, recreational
2 vehicles.

3 Q. Do you recall if they were located on JD Street
4 in Elkhart?

5 A. I believe that's correct.

6 Q. And being in the mobile home or, rather, RV
7 manufacturing business, were you familiar with
8 the type of waste they may have generated?

9 A. They may have, yes.

10 Q. To your knowledge did they generate any types of
11 glue material or adhesives?

12 A. There again, I'd say they may have.

13 Q. How about paints or thinners that they may have
14 generated as wastes?

15 A. They may have.

16 Q. Any type of scrap metal they may have generated?

17 A. A possibility, yes.

18 Q. Did HIMCO pick up their waste at the time you
19 were working there?

20 A. They may have, yes.

21 Q. Do you know of any other company that would have
22 picked up their waste?

23 A. No, sir.

24 Q. Do you know what size container they would have
25 had?

- 1 A. I would say probably a 16-yard.
- 2 Q. And how often would that be picked up to the
3 best of your knowledge?
- 4 A. I would think that it would have been on a
5 call-in basis.
- 6 Q. In this case they would have called up HIMCO or
7 the dispatcher or someone --
- 8 A. Right.
- 9 Q. -- and said, "I have a load, come pick it up"?
- 10 A. Yes, sir.
- 11 Q. And can you think of any other wastes that Eagle
12 Enterprises may have disposed of at the
13 landfill?
- 14 A. No, sir.
- 15 Q. The next name here is Eastwood. Are you
16 familiar with that entity or company?
- 17 A. I took Eastwood as a school, grade school.
- 18 Q. And did Eastwood dispose of their wastes at the
19 County Road 10 landfill at the time you worked
20 there?
- 21 A. I would say yes.
- 22 Q. Do you recall what type of wastes they may have
23 disposed of there or actually did dispose of
24 there?
- 25 A. No.

1 Q. Would it have been general trash and food
2 scraps, things like that?

3 A. I would say it would be the general trash that
4 you would get from the wastebaskets in a normal
5 school. Whether they had a cafeteria or not so
6 you'd get the food scraps, I don't know. Maybe
7 they carried their own lunches.

8 Q. How about Elcona Homes?

9 A. Yes.

10 Q. What type of business was Elcona Homes involved
11 in?

12 A. They manufactured mobile homes.

13 Q. Did Elcona Homes dispose of their waste at the
14 County Road 10 landfill at the time you worked
15 there?

16 A. Yes.

17 Q. Are you familiar with the type of waste that
18 Elcona Homes --

19 A. Yes.

20 Q. -- generated?

21 A. Yes.

22 Q. Did Elcona Homes dispose of any empty glue cans
23 at the landfill?

24 A. Yes.

25 Q. Any empty paint cans at the landfill?

- 1 A. Yes.
- 2 Q. Any scrap metals at the landfill?
- 3 A. Yes.
- 4 Q. Would that be aluminum?
- 5 A. Yes.
- 6 Q. Iron, steel?
- 7 A. Possibly some iron and steel, yes.
- 8 Q. Any types of solvents or empty solvent cans?
- 9 A. Possible.
- 10 Q. Would that be empty cans or cans with --
- 11 A. I'd say empty.
- 12 Q. -- solvent residue?
- 13 A. Yes.
- 14 Q. How about spray paint cans?
- 15 A. Yes.
- 16 Q. Any type of soldering material disposed of at
- 17 the landfill?
- 18 A. I would say very possible.
- 19 Q. Any type of roofing material like asphalt
- 20 shingles?
- 21 A. I don't believe so. I believe they used a metal
- 22 roof.
- 23 Q. Any type of caulking material they may have
- 24 disposed of at the landfill?
- 25 A. Yes.

1 Q. Any types of oils or greases they may have
2 disposed of at the landfill?

3 A. Possible.

4 Q. You believe they may have disposed of oils and
5 greases at the landfill?

6 A. Yes.

7 Q. Can you recall any other types of waste they may
8 have or actually did, rather, dispose of at the
9 landfill at the time you worked there?

10 A. Lots of aluminum wire. I mean copper wire,
11 excuse me.

12 Q. Did that wire have insulation on it, or was it
13 bare?

14 A. It was insulated.

15 Q. With plastic insulation?

16 A. I would assume, yes, it was plastic.

17 Q. Do you believe it was a plastic insulation?

18 A. (Witness nods head.)

19 Q. Yes?

20 A. Yes.

21 Q. I can't recall if I asked this. Did any company
22 other than HIMCO pick up their waste to your
23 knowledge?

24 A. Not to my knowledge.

25 Q. I can't recall if I asked this either. What

1 size container did Elcona Homes have?

2 A. 48-yard.

3 Q. Would that have been one of the largest --

4 A. Yes.

5 Q. -- containers that HIMCO had?

6 A. Yes.

7 Q. Would this have been brought in on a call-in

8 basis?

9 A. I don't believe so. It runs in my mind that

10 when they were running full bore, we would pick

11 that up maybe twice a day. And it runs in my

12 mind that we would pick it up every morning just

13 right off the bat.

14 Q. And was Elcona the only company that put their

15 waste in that container to your knowledge?

16 A. To the best of my knowledge.

17 Q. In other words, that was the container that they

18 rented from HIMCO to put their waste in so you

19 would pick it up; correct?

20 A. True.

21 Q. And were there occasions when you saw this

22 container, this large container, come in to the

23 landfill?

24 A. Yes, sir.

25 Q. Okay. Let's move on to Elkhart Foam. Are you

1 familiar with Elkhart Foam?

2 A. That name -- I'm familiar with the name.

3 Q. Would it help you if you knew they were located
4 at 603 Industrial Parkway?

5 A. No.

6 Q. Are you familiar with Elkhart Foam Products
7 Company?

8 A. Now, that name sounds familiar also.

9 Q. Are you familiar with what type of business
10 they, Elkhart Foam or Elkhart Foam Products, may
11 have been in at the time you worked at the
12 landfill?

13 A. If I had an address -- is Elkhart Foam --

14 Q. Well, I think I said earlier that Elkhart Foam
15 Products was at 603 Industrial Parkway. Does
16 that help you any?

17 A. No, sir.

18 Q. All right. Environmental Leisure is the next
19 name. Are you familiar with that company?

20 A. No, sir.

21 Q. Fabco is next. Are you familiar with Fabco?

22 A. No, sir. The name sounds familiar, but I can't
23 place it.

24 Q. Are you familiar with the company called
25 International Fabricators?

1 A. That also sounds familiar, but I still can't put
2 it together.

3 Q. The next company is Federal Press. Are you
4 familiar with that company?

5 And to help your recollection, I
6 believe Federal Press was located on Bypass Road
7 and also at 500 State Street.

8 A. I recall the Federal Press at 500 State Street.

9 Q. Do you recall what type of business they were
10 engaged in?

11 A. They made punch presses.

12 Q. They actually made the punch press machine?

13 A. Yes, sir.

14 Q. Did Federal Press at Main Street dispose of
15 their waste at the County Road 10 landfill?

16 A. I think you need to rephrase that.

17 Q. I'm sorry. The Federal Press Company that you
18 identified as being located on Main Street, did
19 they dispose of their waste at --

20 A. On State Street?

21 MR. DENNERLINE: I'm sorry, did I say
22 State? I meant Main Street.

23 Let's have the answer read back where
24 we had the address.

25 (Record read.)

1 MR. DENNERLINE: Let's go back on.

2 BY MR. DENNERLINE:

3 Q. All right. Having read back your answer, I was
4 incorrect. I think I said Main Street and
5 confused you.

6 The Federal Press Company which was on
7 State Street that you recall, did they dispose
8 of their waste at the County Road 10 landfill at
9 the time you worked there?

10 A. Yes, sir.

11 Q. Are you familiar with the types of waste that
12 they generated at the time you worked at the
13 landfill?

14 A. Yes, sir.

15 Q. And did Federal Press dispose of their waste at
16 the landfill?

17 A. Yes, sir.

18 Q. What types of waste would they dispose of?
19 Would they dispose of scrap metal or steel?

20 A. I would say in shavings, yes.

21 Q. Metal shavings?

22 A. Yes.

23 Q. Would they dispose of any types of oils or
24 greases? For example, cutting oils?

25 A. In their floor sweepings, yes.

1 Q. Would they dispose of oily rags in their floor
2 sweepings?

3 A. Yes, sir.

4 Q. And when you say in their floor sweepings, you
5 mean greases or cutting solvents that may have
6 dripped into the floor sweepings and been
7 collected?

8 A. Yes, sir.

9 Q. Was Federal Press -- strike that.

10 Do you recall any containers of
11 greases or oils being disposed of at the
12 landfill?

13 A. No, sir.

14 Q. Can you recall any other type of waste that
15 Federal Press may have disposed of at the
16 landfill?

17 A. Bandings and skids and wood and cardboard and
18 their office trash.

19 Q. And HIMCO, I take it, was the only company to
20 your knowledge that collected their waste?

21 A. Yes, sir.

22 Q. What size container do you recall Federal Press
23 having?

24 A. I believe they had an 8-yard.

25 Q. And how often would that be picked up by HIMCO;

1 do you recall?

2 A. I believe it was on a call-in basis.

3 Q. Fleetwing is the next company. Are you familiar
4 with their business?

5 And I believe they were located at 28
6 East State Road 19. And I believe their full
7 name also is Fleetwing Mobile Homes.

8 A. The name sounds familiar, yes.

9 Q. Are you familiar with their business or what it
10 made, what it actually was at the time you
11 worked at the landfill?

12 A. I believe they're in the mobile home business.

13 Q. Are you familiar with the types of waste they
14 generated at the time you worked at the
15 landfill?

16 A. To specifically remember their waste, no.

17 Q. All right. Let's move on to the next name
18 here. I believe it's Frigiking. Are you
19 familiar with Frigiking Company?

20 A. Yes.

21 Q. What type of business was Frigiking involved in
22 at the time you worked at the landfill?

23 A. I believe they were just a supplier of air
24 conditioning units for the mobile home industry.

25 Q. Did Frigiking dispose of their waste at the

1 County Road 10 landfill at the time you worked
2 there?

3 A. Yes, I believe they did.

4 Q. Are you familiar with what types of waste
5 Frigiking generated at that time?

6 A. Just -- all that I can recall is just cardboard,
7 some skids and banding and probably office
8 supply papers.

9 Q. Do you recall any scrap refrigerators they may
10 have disposed of?

11 A. No, sir.

12 Q. Any scrap steel?

13 A. No, sir.

14 Q. Scrap metals?

15 A. No, sir.

16 Q. What size container did Frigiking have; do you
17 recall?

18 A. I believe they had a 16-yard.

19 Q. How often would HIMCO pick up the 16-yard
20 container?

21 A. There again, I believe it's on a call-in basis.

22 Q. Do you know how often it may have been called
23 in?

24 A. I would say maybe once a week.

25 Q. And to the best of your knowledge, would any

1 other company than HIMCO pick up their waste?

2 A. Not to my knowledge.

3 Q. The next name here is Gardner, Inc. Are you
4 familiar with Gardner, Inc.?

5 And I believe they're in the mobile
6 home manufacturing business, but correct me if
7 I'm wrong.

8 A. That's vague, but I believe they were in the
9 mobile home business also.

10 Q. Are you familiar with that company? That's a
11 bad question.

12 Are you familiar with the types of
13 waste that Gardner, Inc. may have generated at
14 the time you worked at the landfill?

15 A. I believe, yes, but I can't recall it in the
16 landfill. I can't recall.

17 Q. All right. Let's move on to the next one here,
18 Godfrey Conveyor, and in parenthesis is 4100
19 Middlebury, which I believe is the address. Are
20 you familiar with that company?

21 A. That name sounds familiar, but no, sir.

22 Q. The next company here is Goshen Die. Are you
23 familiar with Goshen Die?

24 A. No, sir.

25 Q. The next company is Goshen Distilling. Are you

1 familiar with that company?

2 A. No, sir.

3 Q. The next company here is Goshen Tops. Are you
4 familiar with that company?

5 A. No, sir.

6 Q. I believe they manufactured truck caps. Does
7 that help your recollection?

8 A. I believe that's correct, but I've just seen the
9 sign. It doesn't help me for whether they
10 dumped in the landfill or not, no, sir.

11 Q. All right. The next company is Greenscraft.
12 Are you familiar with that company?

13 A. No, sir.

14 Q. The next one is Haffner Supply. Are you
15 familiar with that company?

16 A. No, sir.

17 Q. I believe they're located at 1900 West Hively
18 Avenue. Would that help your recollection?

19 A. No, sir.

20 Q. All right. The next company is Hart Plus. Are
21 you familiar with that company?

22 A. No, sir.

23 Q. The next company is Howmet. Are you familiar
24 with that company?

25 A. Yes, sir.

1 Q. What type of business was Howmet in during the
2 period you worked at the landfill?

3 A. They were in the aluminum business. They
4 supplied roofs and aluminum siding for mobile
5 homes.

6 Q. Would those be aluminum roofs or some type of
7 metal roof?

8 A. They were metal, but I believe it was a
9 galvanized roof.

10 Q. And did Howmet dispose of their waste at the
11 County Road 10 landfill at the time --

12 A. Yes, sir.

13 Q. -- you worked there?

14 Are you familiar with what types of
15 waste they generated at the time you worked
16 there?

17 A. Yes, sir.

18 Q. Did Howmet dispose of scrap aluminum?

19 A. Yes, sir.

20 Q. Scrap galvanized steel?

21 A. Yes, sir.

22 Q. Did they dispose of any type of soldering
23 material?

24 A. Not to my knowledge, no, sir.

25 Q. Now, I take it, and you correct me if I'm wrong,

1 that to shape this metal they had to have
2 machines to shape that metal?

3 A. Yes, sir.

4 Q. Do you recall any types of greases from those
5 machines being disposed of at the landfill?

6 A. No, sir.

7 Q. Do you recall any types of other materials that
8 may have been disposed of at the landfill at the
9 time you worked there?

10 A. Lots of steel banding and scrap skids and
11 cardboard and paper.

12 Q. Any type of metal finishing solvents disposed of
13 at the landfill? For example, empty cans of
14 those?

15 A. No, sir. I don't believe.

16 Q. All right. The next company is Intertherm. Are
17 you familiar with Intertherm?

18 And I believe they were located at
19 2044 West Lusher.

20 A. No, sir.

21 Q. Okay. The next company is J & L Paint. Are you
22 familiar with that company?

23 A. The name sounds familiar. But no, I don't --

24 Q. You don't recall anything specific?

25 A. (Witness shakes head.)

- 1 Q. No, yes?
- 2 A. No.
- 3 Q. All right. The next company named here is John
4 Deere. Are you familiar with that company?
- 5 A. No.
- 6 Q. Are there John Deere distributorships in
7 Elkhart? Maybe that's what that's referring to.
- 8 A. It's a possibility.
- 9 Q. Was John Deere a customer of HIMCO at the time
10 you worked there to the best of your knowledge?
- 11 A. I believe they were.
- 12 Q. Do you recall, was it all the dealers in the
13 area, or was it a specific one that you can
14 recall, assuming there is more than one John
15 Deere dealership around here?
- 16 A. I would say there was one.
- 17 Q. Do you recall which one?
- 18 A. Kauffman John Deere dealer in Goshen.
- 19 Q. Do you recall what types of waste they disposed
20 of at the landfill?
- 21 A. No, sir. Because I believe it's a front-end
22 loader. And I'm not so sure that they would
23 have been our customer back in the time frame of
24 County Road 10.
- 25 Q. All right. The next company named here is Kmart

1 Tire. Are you familiar with that company?

2 A. Yes.

3 Q. Do you know what type of business Kmart was
4 engaged in at the time you worked at the
5 landfill?

6 A. Rephrase that question.

7 Q. Sure. What type of business was Kmart involved
8 in at the time you worked at the landfill?

9 A. Well, they were a Kmart store, but I believe
10 they also had a tire store.

11 Q. So they sold tires?

12 A. Right.

13 Q. Did Kmart Tire dispose of their waste at the
14 landfill at the time you worked there?

15 A. Yes.

16 Q. Do you recall what types of waste they disposed
17 of at the landfill?

18 A. The only thing I can recall is probably a few
19 old tires and the paper supplies that it took to
20 run their tire store.

21 Q. Do you recall any type of automobile fluids that
22 were disposed of at the landfill, like oils or
23 brake fluids?

24 A. No, sir.

25 Q. Any types of spare auto parts they may have

1 thrown away?

2 A. No, sir.

3 Q. What size container did Kmart have at the time
4 you worked at the landfill?

5 A. I believe they had a front-end -- I think they
6 had a 4-yard.

7 Q. And how often would that be picked up?

8 A. There again, I'd say probably on a once-a-week
9 basis.

10 Q. And to the best of your knowledge, did any other
11 company than HIMCO pick up their waste?

12 A. No, sir.

13 Q. The next company here is Kevco. Are you
14 familiar with that company?

15 A. No, sir.

16 Q. The next company here is Koven-Ellis Clinic.
17 Are you familiar with that?

18 A. No, sir.

19 Q. The next one here is Lamidor. Are you familiar
20 with that company?

21 A. No, sir.

22 Q. The next one is Martins Lite & Switch.

23 A. No, sir.

24 Q. I take it you're not familiar with that?

25 A. No, sir.

1 Q. All right. MEFCO is an acronym or it appears to
2 be. Are you familiar with that company?

3 A. It should ring a bell, but it doesn't.

4 Q. You can't recall anything about that company?

5 A. No, sir.

6 Q. All right. The next company listed here is
7 Midwest Coding, it says. Are you familiar with
8 that company?

9 A. Not Midwest Coding, no.

10 Q. The next company here is Montgomery Ward. Are
11 you familiar with that company?

12 A. Yes.

13 Q. Were they in operation at the time you worked at
14 the landfill?

15 A. Yes.

16 Q. Do you recall what type of business they were
17 involved in?

18 This is the same Montgomery Ward we
19 all think of, I guess?

20 A. Right.

21 Q. Do you recall if they had an auto service center
22 there or they sold tires or anything like that?

23 A. I really don't recall that they have a tire
24 store, but they may have.

25 Q. Did Montgomery Ward dispose of their wastes at

1 the County Road 10 landfill?

2 A. Yes.

3 Q. Do you recall what types of waste they disposed
4 of?

5 A. Mostly that I can remember about Montgomery Ward
6 was just cardboard, plastic that clothing is
7 sealed in, and a few bands and skids. And I
8 believe they might have shared a container.

9 Q. At the mall?

10 A. At the mall.

11 Q. I'm assuming they were at Pierre Moran Mall; is
12 that correct?

13 A. Yes, that's correct.

14 Q. You mentioned plastic as a waste. What type of
15 plastic were you talking about?

16 A. Well, clothing, little -- when they put the
17 clothing out on the racks --

18 Q. They would cover it with a plastic -- like a
19 clear plastic bag?

20 A. Right, right. And it would have the Montgomery
21 Ward name on it. And I recall seeing --

22 Q. You saw that at the landfill being disposed of?

23 A. Yes.

24 Q. Do you recall any types of cans of paint or any
25 types of solvents they may have disposed of?

- 1 A. No, sir.
- 2 Q. Do you recall any other types of waste?
- 3 A. No, sir.
- 4 Q. What size container did Montgomery Ward have at
5 the mall?
- 6 A. I'm going to say 16-yard.
- 7 Q. And how often was that picked up by HIMCO?
- 8 A. I think that was in on a call-in basis also.
- 9 Q. Do you recall approximately how often that would
10 be called in?
- 11 A. I would say on average maybe once a week.
- 12 Q. And to the best of your knowledge, did any other
13 company than HIMCO pick up their waste?
- 14 A. Not to my knowledge.
- 15 Q. All right. The next company here is Nagle's
16 Office Supply. Are you familiar with that
17 company?
- 18 A. Yes, sir.
- 19 Q. And what type of business was Nagle's involved
20 in at the time you worked at the landfill?
- 21 A. Just they sold office supplies to the industries
22 around town.
- 23 Q. And are you familiar with what type of waste
24 they generated at the time you worked at the
25 landfill?

1 A. Yes.

2 Q. Would that be any types of scrap paper?

3 A. Yes.

4 Q. Any types of inks?

5 A. It's a possibility, but not that I recall.

6 Q. Do you recall any type of ink containers?

7 A. No.

8 Q. What other type of waste do you recall?

9 A. I don't. Just -- just office supply, just

10 regular office paper that it takes to run a --

11 carbon paper probably and --

12 Q. Do you recall them disposing of carbon paper?

13 A. Yes.

14 Q. What size container did Nagle's have?

15 A. I think they had a 4-yard container.

16 Q. And how often would that be picked up by HIMCO?

17 A. Probably on a once-a-week basis.

18 Q. And would any other company than HIMCO pick it

19 up?

20 A. Not to my knowledge.

21 Q. Or pick up any other waste, not just the

22 container?

23 A. Not to my knowledge.

24 Q. The next company is Neil Sheet Metal. Are you

25 familiar with that company?

1 A. No, sir.

2 Q. Nibco is next. Are you familiar with that
3 company?

4 A. Yes, sir.

5 Q. Do you know what the Nibco stands for, assuming
6 it stands for anything?

7 A. Northern Indiana Brass Company, I believe it
8 is.

9 Q. And what type of business was Nibco or Northern
10 Indiana Brass Company involved in at the time
11 you worked at the landfill?

12 A. They were -- they were a manufacturer of copper
13 and brass fittings for the plumbing industry,
14 air conditioning industry, anybody that wanted
15 copper or brass fittings to my knowledge.

16 Q. Did Nibco dispose of their waste at the County
17 Road 10 landfill at the time you worked there?

18 A. Yes, sir.

19 Q. And are you familiar with the types of waste
20 they generated at that time?

21 A. Yes, sir.

22 Q. Did they dispose of scrap brass material?

23 A. Yes, sir.

24 Q. Any other type of scrap metal that you recall?

25 A. Copper.

- 1 Q. Scrap copper?
- 2 A. (Witness nods head.)
- 3 Q. Yes?
- 4 A. Yes.
- 5 Q. Do you recall any types of greasers that they
- 6 disposed of?
- 7 A. Could you rephrase that.
- 8 Q. Sure. Did Nibco dispose of any greasers at the
- 9 landfill?
- 10 A. Yes, sir.
- 11 Q. How about any types of caustic solutions or
- 12 solvents, do you recall if they disposed of
- 13 those at the landfill?
- 14 A. No, sir.
- 15 MR. DENNERLINE: Let's take a break.
- 16 (Whereupon a short recess was
- 17 taken.)
- 18 (Mr. Paulen leaves.)
- 19 MR. DENNERLINE: Let's have the last
- 20 question and answer read back.
- 21 (Record read.)
- 22 MR. DENNERLINE: Let's go back on the
- 23 record.
- 24 BY MR. DENNERLINE:
- 25 Q. Mr. Perrin, we were talking about Nibco, and I

1 said "greasers" before. I think I meant to say
2 "degreasers."

3 Did Nibco dispose of degreasers at the
4 landfill?

5 A. Not to my knowledge, no, sir.

6 Q. They didn't?

7 A. Not degreasers.

8 Q. All right. How about machine oil, any type of
9 machine oil?

10 A. Yes, sir.

11 Q. I can't recall if I asked this, but what size
12 container did Nibco have?

13 A. I believe they had a 16-yard.

14 Q. And how often was that picked up by HIMCO?

15 A. I would say they were probably on a once-a-week
16 basis. I believe they were on a call-in basis.

17 Q. And that call-in basis would have been picked up
18 about once a week on average?

19 A. I would assume so, yes.

20 Q. And to the best of your knowledge, did any other
21 company than HIMCO pick up their waste?

22 A. Not to my knowledge.

23 Q. The next company here is Olympic Caps. Are you
24 familiar with Olympic Caps?

25 A. The name sounds familiar, and I believe they

1 sell caps for pickup trucks, but I don't recall
2 their trash, no, sir.

3 Q. The next company is P.M. Packers. Are you
4 familiar with them? Well, are you familiar with
5 P.M. Packers?

6 A. Yes. I take P.M. Packers as Pierre Moran Mall's
7 packer machine.

8 Q. And when you say "packer machine," what does
9 that mean?

10 A. It's a stationary compactor. By stationary, the
11 packer part stays there and you back up to it
12 and drop off a box that has a little square hole
13 in the back that the compactor can compress the
14 trash into it.

15 Q. So this isn't the name of the company; this is
16 the name of a container, I mean the type of
17 container at the mall?

18 A. That's -- yes, that's the way I -- I would take
19 that as Pierre Moran packer.

20 Q. All right. So this would be the packer that
21 Pierre Moran Mall had out at the mall --

22 A. Right.

23 Q. -- that HIMCO picked up?

24 A. Yes, sir.

25 Q. Was this used by everyone in the mall, or was it

1 certain customers that used this packer?

2 A. It's a little bit out of my range, but as much
3 as I know about it, I would say there were
4 several stores out there that used the packer,
5 yes.

6 Q. Do you recall which ones?

7 A. No, sir.

8 Q. All right. Let's move on to Pan American
9 Gyrotek. Are you familiar with that company?

10 A. No, sir.

11 Q. Would it help your recollection if you knew they
12 were located at 3007 Phillips Street in Elkhart?

13 A. No, sir.

14 Q. All right. Let's move on to the next one.
15 Paradise Tops, are you familiar with that
16 company?

17 A. There again, that sounds familiar and I've seen
18 that sign, and I believe that they sell caps for
19 -- I believe it's just a sales lot for pickup
20 truck caps, but I don't recall their trash.

21 Q. Do you recall if HIMCO picked up their trash to
22 the best of your knowledge?

23 A. I don't -- no, I don't recall.

24 Q. All right. Let's move on to Patrick
25 Industries. Are you familiar with that company?

- 1 A. No, sir.
- 2 Q. Patrick Plywood, are you familiar with that
3 company?
- 4 A. Yes, sir.
- 5 Q. And what type of business was Patrick Plywood in
6 at the time you worked at the landfill?
- 7 A. They -- they just had plywood, particle board.
- 8 Q. They manufactured it or they retailed it?
- 9 A. No, they retailed it.
- 10 Q. And are you familiar with the types of waste
11 that they disposed of in the landfill?
- 12 A. Yes, sir.
- 13 Q. Did they dispose of scrap wood?
- 14 A. Yes, sir.
- 15 Q. Scrap chipboard?
- 16 A. Yes, sir.
- 17 Q. Did they dispose of insulation?
- 18 A. Yes, sir.
- 19 Q. Did they dispose of any types of glues or
20 adhesives?
- 21 A. Not to my knowledge.
- 22 Q. And when they threw away scrap wood, would that
23 be chunks of wood or would they throw away whole
24 boards or --
- 25 A. No. I would say more or less damaged sheets and

1 skids and banding and paper that just -- as this
2 was brought to their company, they would take
3 the paper off of the bundles and throw it into
4 the scrap.

5 Q. And when we say chipboard or use that term,
6 correct me if I'm wrong, is that like a particle
7 board that is compressed wood chips?

8 A. Right.

9 Q. Compressed together with a glue-type material?

10 A. Yes.

11 Q. Do you recall what size container Patrick
12 Plywood had?

13 A. I believe they were around a 16- to 22-yard
14 container also.

15 Q. And how often was that picked up by HIMCO?

16 A. There again, I would say it was on a call-in
17 basis.

18 Q. On average how often would it be called in?

19 A. I'd just say once a week.

20 Q. And to the best of your knowledge, did any other
21 company than HIMCO pick up Patrick Plywood's
22 waste?

23 A. Not to my knowledge, no, sir.

24 Q. The next company is Perma Bond. Are you
25 familiar with that company?

1 A. No, sir.

2 Q. All right. The next company is Pierce Tool.

3 Are you familiar with that company?

4 A. No, sir.

5 Q. Would it help your recollection if you knew they

6 were located on South Main Street at the time?

7 A. No, sir. The name's very familiar, but I cannot

8 put them together.

9 Q. All right. The next company is Prairie

10 Village. Are you familiar with that entity or

11 company?

12 A. To my best recollection, it's a -- it's an

13 apartment complex.

14 Q. And did Prairie Village dispose of their waste

15 at the landfill at the time you worked there?

16 A. Yes, sir.

17 Q. And what type of waste would they dispose of?

18 A. Just normal everyday household trash.

19 Q. What size container did Prairie Village have?

20 A. I believe they had a 4-yard. I believe they

21 might have had two or three of them.

22 Q. Two or three of those type containers?

23 A. Uh-huh.

24 Q. And how often would they have those picked up by

25 HIMCO?

- 1 A. I would say probably twice a week.
- 2 Q. And to the best of your knowledge, was HIMCO the
3 only company that picked up their waste?
- 4 A. Yes, sir.
- 5 Q. The next company here is Quest Products. Are
6 you familiar with that company?
- 7 A. Yes, sir.
- 8 Q. And what type of business was Quest Products
9 involved in at the time you worked at the
10 landfill?
- 11 A. To my best recollection, they were a plumbing --
12 supplier of plastic plumbing supplies.
- 13 Q. Would that include plastic tubing and connectors
14 like elbows and couplings?
- 15 A. Yes, sir.
- 16 Q. Any other type of plastic material they
17 supplied?
- 18 A. Not that I can recall, no, sir.
- 19 Q. Did Quest Products dispose of their waste at the
20 landfill at the time you worked there?
- 21 A. Yes, sir.
- 22 Q. And are you familiar with the types of waste
23 that they disposed of?
- 24 A. Yes, sir.
- 25 Q. Would that include scrap plastic material?

- 1 A. Yes, sir.
- 2 Q. How about scrap elbows?
- 3 A. Yes, sir.
- 4 Q. Scrap couplings?
- 5 A. Yes, sir.
- 6 Q. Any other type of plastic plumbing fixtures?
- 7 A. I believe, as I recall, they used to throw away
8 these little valves once in a while, little
9 shut-off valves.
- 10 Q. Plastic valves?
- 11 A. Yes.
- 12 Q. Did they dispose of any type of glues or
13 adhesives for plastic forming?
- 14 A. Not that I can recall.
- 15 Q. Any other types of solvents?
- 16 A. Not that I can recall.
- 17 Q. Any types of dyes or paints?
- 18 A. Not that I can recall.
- 19 Q. How large a container did Quest Products have at
20 the time you worked at the landfill?
- 21 A. I believe they had a 16-yard too.
- 22 Q. How often was that picked up?
- 23 A. I would say maybe once a week. Maybe once every
24 two weeks. I think they were a call-in
25 customer.

1 Q. And to the best of your knowledge, did any other
2 company than HIMCO pick up their waste?

3 A. Not to my knowledge.

4 Q. Let's move on to R-Way. Are you familiar with
5 that company?

6 A. No, sir.

7 Q. The next company is R.R. Recovery. Are you
8 familiar with that company?

9 A. No, sir.

10 Q. The next company is Rocket Car Wash. Are you
11 familiar with that company?

12 A. Yes, sir.

13 Q. What type of business -- it may be evident from
14 its name, but what type of business was Rocket
15 Car Wash involved in at the time you worked at
16 the landfill?

17 A. The car washing business.

18 Q. All right. Did Rocket Car Wash dispose of their
19 waste at the landfill at the time you worked
20 there?

21 A. Yes, sir.

22 Q. And are you familiar with the types of waste
23 they disposed of?

24 A. To the best of my knowledge, it was just, I
25 think, a 3-yard container, and I would say

1 basically the office paper that it took to run
2 the car wash.

3 Q. Did they dispose of any used rags or buffing
4 cloths they may have used?

5 A. It's possible, but not to my -- not that I
6 recall.

7 Q. Did they dispose of soaps or detergents that
8 they used at the car wash?

9 A. It runs in my mind that they threw away some
10 cardboard containers that had car wash soap in
11 them, yes, sir.

12 Q. And what other types of waste do you recall them
13 disposing of at the landfill?

14 A. Not -- I believe that's all.

15 Q. And you said they had a 3-yard container, I
16 believe. How often was that picked up?

17 A. I would presume that was done about once a
18 week.

19 Q. You believe it was once a week?

20 A. Yes.

21 Q. And to the best of your knowledge, did any other
22 company than HIMCO pick up their waste?

23 A. Not to my knowledge.

24 Q. The next company we have here is Schultz
25 Warehouse. Are you familiar with that company?

- 1 A. Yes.
- 2 Q. And what type of business was Schultz Warehouse
3 engaged in during the time that you work at the
4 landfill?
- 5 A. They supplied the mobile home industry with a
6 little bit of everything, I think.
- 7 Q. So it was a supply warehouse?
- 8 A. Yes.
- 9 Q. Would they supply framing or building material,
10 or was it more specific than that?
- 11 A. I believe it was more like refrigerators,
12 stoves, and what have you.
- 13 Q. So appliances?
- 14 A. If I -- if my recollection is correct.
- 15 Q. Do you recall what types of waste they disposed
16 of at the landfill?
- 17 A. The only thing that I can recall about Schultz
18 Warehouse was just skids and banding and
19 cardboard and office paper.
- 20 Q. Did they dispose of any scrap appliances or
21 scrap refrigerators, for example?
- 22 A. Not that I can recall.
- 23 Q. Did they dispose of any types of glues or
24 epoxies?
- 25 A. Not that I can recall.

- 1 Q. Any empty containers of solvents?
- 2 A. Not that I can recall.
- 3 Q. Any empty containers of paints or thinners or --
- 4 A. Not that I recall, sir.
- 5 Q. What size container did Schultz have?
- 6 A. I believe there again they had a 16-yard.
- 7 Q. And how often was that picked up?
- 8 A. I'd say once a week.
- 9 Q. And did any other company than HIMCO pick up
- 10 their waste?
- 11 A. Not to my knowledge.
- 12 Q. The next name we have here is St. Vincent. Are
- 13 you familiar with St. Vincent?
- 14 A. It's a church, Catholic church.
- 15 Q. And what type of trash would they dispose of?
- 16 A. I don't recall their trash, sir.
- 17 Q. Did they dispose of it at the County Road 10
- 18 landfill to the best of your knowledge?
- 19 A. I would presume, yes.
- 20 Q. Well, let's move on to T.C. Enterprises. Are
- 21 you familiar with that company?
- 22 A. No, sir.
- 23 Q. The next company is Thermco. Are you familiar
- 24 with that company?
- 25 A. No, sir.

- 1 Q. The next company is Thompson Manufacturing. Are
2 you familiar with that company?
- 3 A. That name rings a bell, but that's all I can
4 tell you.
- 5 Q. I believe they're located on Elm Street. Would
6 that help your recollection?
- 7 A. No, sir.
- 8 Q. The next company listed is Travelcraft. Are you
9 familiar with that company?
- 10 A. Yes, sir. The name's familiar. I know where
11 it's at.
- 12 Q. Are you familiar with the type of business they
13 were engaged in at the time you worked at the
14 landfill?
- 15 A. I believe they were a travel trailer
16 manufacturer.
- 17 Q. Did Travelcraft dispose of their waste at the
18 landfill at the time you worked there?
- 19 A. They may have.
- 20 Q. Do you recall what type of wastes they may have
21 disposed of?
- 22 A. No, sir.
- 23 Q. Are you familiar with Turner Industries?
- 24 A. No, sir.
- 25 Q. Are you familiar with United Sales?

- 1 A. No, sir.
- 2 Q. Are you familiar with Universal Gypsum?
- 3 A. Yes, sir.
- 4 Q. What type of business were they involved in?
- 5 A. They would take the calcium sulfate from Miles
6 Laboratories and dry it out and sell it to the
7 gypsum people to make drywall or whatever they
8 do.
- 9 Q. And what types of waste would they deposit in
10 the landfill?
- 11 A. The only thing I can remember about Universal
12 Gypsum is that they would have some skids, some
13 cardboard, and some heavy paper or bags.
- 14 Q. What size container did they have?
- 15 A. I believe they also had a 16-yard.
- 16 Q. And how often was that picked up?
- 17 A. I believe that was a call-in basis. I doubt if
18 it was over once a week to my recollection.
- 19 Q. And did HIMCO pick up all their waste to the
20 best of your knowledge?
- 21 A. To the best of my knowledge, yes.
- 22 Q. All right. The next one is Versail
23 Manufacturing. Are you familiar with that
24 company?
- 25 A. No, sir. The name is familiar, but I can't

1 place it.

2 Q. Can you recall what business they were in, what
3 they may manufacture?

4 A. No, sir.

5 Q. The next company is W.K. Industries. Are you
6 familiar with that company?

7 A. No, sir.

8 Q. The next company listed is W.T. Grant. Are you
9 familiar with that company?

10 A. Yes, sir.

11 Q. What type of business is W.T. Grant involved in
12 and was involved in at the time you worked at
13 the landfill?

14 A. It was like a department store, I'd call it.

15 Q. And did W.T. Grant dispose of their waste at the
16 landfill at the time you worked there?

17 A. Yes, sir.

18 Q. What type of waste do you recall them disposing
19 of at the landfill?

20 A. Nothing other than the regular cardboard, a few
21 skids, and the plastic again that the clothing
22 would be sent in in, and these cardboard boxes
23 and it might have W.T. Grant on it, and then the
24 regular office supply paper that it took to run
25 the store, I guess.

1 Q. Did they -- they disposed of plastic that
2 covered clothing; is that correct?

3 A. Yes.

4 Q. And it had their name on the plastic; is that
5 correct?

6 A. Yes.

7 Q. Did they dispose of any scrap appliances?

8 A. It's possible, but not that I can recall.

9 Q. Did they dispose of scrap or empty paint cans
10 with residue?

11 A. Not that I can recall, no, sir.

12 Q. Any types of glue cans?

13 A. No, sir.

14 Q. Any type of building material like caulking?

15 A. Not that I can recall.

16 Q. What size container did W.T. Grant have at the
17 time you worked at the landfill?

18 A. 16-yard.

19 Q. How often was that picked up?

20 A. There again, I think probably on a once-a-week
21 basis.

22 Q. And did HIMCO pick up all W.T. Grant's waste to
23 the best of your knowledge?

24 A. To the best of my knowledge.

25 Q. The next company listed is Winlite, I believe.

1 Are you familiar with that company?

2 A. There again, that name is very familiar, but I
3 -- no.

4 Q. Would it help your memory if you knew they were
5 or I represented to you that they were a window
6 manufacturer?

7 A. It's possible. It rings a bell, but I can't --
8 I can't recall their trash.

9 Q. All right. Woodsman is the next company. Are
10 you familiar with it?

11 A. No, sir.

12 Q. Would it help your recollection if you knew that
13 they manufactured camper trailers?

14 And I believe they're located or were
15 located on Middle Run Road.

16 A. That's -- that sounds very familiar, but there
17 again, I can't recall their trash.

18 Q. All right. The next company or the last company
19 listed is Yukon Delta. And I believe they're
20 located on JD Street in Elkhart. Are you
21 familiar with that company?

22 A. Yes, sir. The name is very familiar. And I
23 believe they were -- they made a recreational
24 vehicle trailer.

25 Q. And did they dispose of their waste at the

1 landfill at the time you worked there?

2 A. It's possible. But there again, I -- I can see
3 the little trailer, but I can't recall -- I
4 think they were relatively small, and I don't
5 recall their trash.

6 Q. All right. Was HIMCO the only company to your
7 knowledge that picked up their waste?

8 A. Yes, sir.

9 Q. And do you recall what size container they had?

10 A. I don't.

11 Q. All right. That's the end of our list on
12 Exhibit 2 of the additional -- what we believe
13 were additional customers of HIMCO.

14 Let me just ask you one last question,
15 Mr. Perrin.

16 You've listed off for some of these
17 companies some wastes that they disposed of at
18 the County Road 10 landfill at the time you
19 worked there. Is it correct to say that for all
20 these companies to the best of your knowledge
21 HIMCO was the only company that picked up their
22 waste at the time? In other words, these were
23 customers of HIMCO?

24 A. Yes, sir.

25 Q. And that to the extent that they generated

1 waste, HIMCO -- it would have gone into the
2 HIMCO dumpsters and been picked up by HIMCO to
3 the best of your knowledge?

4 A. To the best of my knowledge, yes, sir.

5 MR. DENNERLINE: Okay. That's the end
6 here. Thank you for your time, Mr. Perrin.

7 THE WITNESS: You're welcome.

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I have read the foregoing transcript and wish to make (select one):

_____ no changes or corrections;

_____ the following changes or corrections
(attach additional sheets if necessary):

Page	Line	Correction	Reason for change
------	------	------------	-------------------

JERRY D. PERRIN

SUBSCRIBED AND SWORN TO before me
this _____ day of _____,
A.D., 19____.

Notary Public, State of _____
County of Residence: _____
My Commission Expires: _____

CERTIFICATE

I, Rosemary J. Bell, CSR, RPR, a Notary Public in and for the County of St. Joseph and State of Indiana, do hereby certify there appeared before me JERRY D. PERRIN, who was previously duly sworn by me to tell the truth and nothing but the truth in response to questions propounded.

I further certify that I then and there reported in machine shorthand the proceedings at the said time and place; that the proceedings were then reduced to typewriting from my original shorthand notes; and that the foregoing typewritten transcript is a true and correct record thereof.

I further certify that the deposition was read and signed in the presence of a duly authorized officer.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this ____ day of _____, 1992.

Rosemary J. Bell, CSR, RPR, CP
Notary Public, State of Indiana
Residence: St. Joseph County
My Commission Expires: 9-18-94

10/14/92

Additional Himco Customers (2)

Customer Name

Abshire 1330 Benham

Accent Industries

Action Lighting

Actionflex

Alcan Aluminum

Alpine Wood Products

American Fiberglass

American Gyro-Tex

American Sterling

Amerigo

ARA Service

Atlas Axle

Batteries Unlimited

BTK Extra

Burton Enterprises

Caustic Ready

Chemcraft

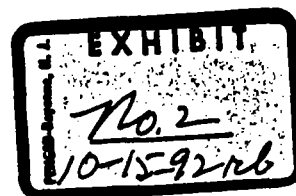
Coleman Co.

compressed Air

concord Motor Home

Conoplastics

Consoweld



Customer Name

D & M Glass

Eagle Enterprises

Eastwood

Elcona Homes

Elkhart Foam

Environmental Leisure

Fabco

Federal Press

Fleetwing

Frigiking

Gardner, Inc.

Godfrey Conveyor (4100 Middlebury)

Goshen Die

Goshen Distilling

Goshen Tops

Greenscraft

Haffner Supply

Hart Plus

Howmet

Intertherm

J & L Paint

John Deere

Customer Name

K-Mart Tire

Kevco

Koven-Ellis Clinic

Lamidor

Martins Lite & Switch

MEFCO

Midwest Coding

Montgomery Ward

Nagle's Office Supply

Neil Sheet Metal

Nibco

Olympic Caps

P.M. Packers

Pan American Gyrotek

Par-A-Dise Tops

Patrick Industries

Patrick Plywood

Perma Bond

Pierce Tool

Prairie Village

Quest Products

R-Way

Customer Name

R.R. Recovery

Rocket Car Wash

Schultz Warehouse

St. Vincent

T.C. Enterprises

Thermco

Thompson Mfg.

Travelcraft

Turner Industries

Untied Sales

Universal Gypsum

Versall Mfg.

W.K. Industries

W.T. Grant

Winlite

Woodsman

Yukon Delta